

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

MAXWELL KADEL; JASON FLECK;  
CONNOR THONEN-FLECK;; JULIA  
MCKEOWN; MICHAEL D. BUNTING, JR.;  
C.B., by his next friends and parents,  
MICHAEL D. BUNTING, JR. and SHELLEY  
K. BUNTING; SAM SILVAINE; and DANA  
CARAWAY, a/k/a DOWD CARAWAY,

*Plaintiffs,*

v.

DALE FOLWELL, in his official capacity as  
State Treasurer of North Carolina; DEE  
JONES, in her official capacity as Executive  
Administrator of the North Carolina State  
Health Plan for Teachers and State Employees;  
UNIVERSITY OF NORTH CAROLINA AT  
CHAPEL HILL; NORTH CAROLINA  
STATE UNIVERSITY; UNIVERSITY OF  
NORTH CAROLINA AT GREENSBORO;  
and NORTH CAROLINA STATE HEALTH  
PLAN FOR TEACHERS AND STATE  
EMPLOYEES; and NORTH CAROLINA  
DEPARTMENT OF PUBLIC SAFETY,

*Defendants.*

No. 1:19-cv-00272-LCB-LPA

**MOTION TO WITHDRAW AS  
COUNSEL**

NOW COMES Noah Lewis, having previously made a special appearance pursuant to Local Rule 83.1, respectfully requests an order allowing him to withdraw as counsel for all Plaintiffs in the above-captioned civil action (“Plaintiffs”). In support of this motion, undersigned counsel states as follows:

1. On March 11, 2019, the undersigned counsel entered a notice special notice of appearance for Mr. Lewis of the Transgender Legal Defense and Education Fund (“TLDEF”) as counsel for the Plaintiffs.

2. Mr. Lewis has resigned from his position effective August 27, 2021.

3. David Brown will continue to represent Plaintiffs on behalf of TLDEF, and all other counsel of record will continue to represent all Plaintiffs, so there will be no detriment to or disruption to the Plaintiff’s legal representation.

4. The undersigned certifies that the granting of this Motion will not delay the proceedings in this matter or this Court.

**WHEREFORE**, undersigned counsel respectfully asks this Court to grant this motion for leave of Court to withdraw Mr. Lewis’s representation of the above named Plaintiffs, and to terminate his appearance as counsel of record in this case.

\* \* \*

Respectfully submitted, this 27th day of September, 2021.

Dated: September 27, 2021

Respectfully submitted,

/s/ David Brown

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*Counsel for Plaintiffs*

\* Appearing by special appearance pursuant to L.R. 83.1(d).

## CERTIFICATE OF SERVICE

I certify that the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system which will send notification of such filing to all registered users.

Dated: September 27, 2021

/s/ David Brown

David Brown\*

Noah E. Lewis\*

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